

EXHIBIT B

From: [Stephen S. Zashin](#)
To: [Greenspan, David](#); [Kessler, Jeffrey L.](#); [Amoona, Jonathan](#); [Mercier-Dalphond, Isabelle](#); [Gordon, Ben](#)
Cc: [David R. Vance](#); [Patrick J. Hoban](#)
Subject: Re: Johnson/NFLPA
Date: Wednesday, October 17, 2018 10:29:01 AM
Attachments: [3294EA3B-98C7-4599-8E46-B39DA526E41D\[7\].png](#)
[9F3DC3FB-B94F-406C-A0CD-C77EE56ED1FA\[7\].png](#)
[2774E3EA-1B9F-4531-B924-B015CB098BDE\[7\].png](#)
[E8E99301-A5A1-4148-AB6B-823EB0FE91DB\[7\].png](#)
[image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

David:

Thanks for your letter. Johnson disagrees that the NFLPA has provided a complete copy of the applicable CBA and the NFLPA can moot his claims at this stage of the litigation. Rather, Johnson intends on seeking a jury trial and all damages (economic, non-economic and punitive) and attorneys' fees as provided for by the LMRDA. As a result, please provide your paragraph(s) to Judge Sullivan to us by noon tomorrow. We will incorporate the NFL's position and the NFLPA's position with Johnson's position in a joint letter as required by the Court.

Thanks.

Stephen



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From: "dgreenspan@winston.com" <dgreenspan@winston.com>

Date: Tuesday, October 16, 2018 at 6:43 PM

To: Stephen Zashin <ssz@zrlaw.com>, Jeffrey Kessler <JKessler@winston.com>, Jonathan Amoona <JAmoona@winston.com>, Isabelle Mercier-Dalphond <IMercier@winston.com>, "Gordon, Ben" <BGordon@winston.com>

Cc: David Vance <drv@zrlaw.com>, Patrick Hoban <pjh@zrlaw.com>

Subject: RE: Johnson/NFLPA

Stephen—

A letter (and enclosures) setting forth the NFLPA's position is attached. Once you have had a chance to review, please let us know how you would like to proceed from here.

Thanks.

From: Greenspan, David
Sent: Tuesday, October 16, 2018 11:26 AM
To: 'Stephen S. Zashin' <ssz@zrlaw.com>; Kessler, Jeffrey L. <JKessler@winston.com>; Amoona, Jonathan <JAmoona@winston.com>; Mercier-Dalphond, Isabelle <IMercier@winston.com>
Cc: David R. Vance <drv@zrlaw.com>; Patrick J. Hoban <pjh@zrlaw.com>
Subject: RE: Johnson/NFLPA

We will send you a letter setting forth the NFLPA's position today. Thanks.

From: Stephen S. Zashin [<mailto:ssz@zrlaw.com>]
Sent: Tuesday, October 16, 2018 11:25 AM
To: Kessler, Jeffrey L. <JKessler@winston.com>; Amoona, Jonathan <JAmoona@winston.com>; Mercier-Dalphond, Isabelle <IMercier@winston.com>; Greenspan, David <DGreenspan@winston.com>
Cc: David R. Vance <drv@zrlaw.com>; Patrick J. Hoban <pjh@zrlaw.com>
Subject: Johnson/NFLPA

All:

We have consulted with the NFL and are putting together a joint letter per Judge Sullivan's order. Please provide us with a paragraph concerning the NFLPA's position in the above referenced matter or let us know if you would like to have a phone call prior to Thursday. Given Thursday's deadline, please provide us with the courtesy of a response no later than 5pm today.

Stephen



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